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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

FILED

SEP 03 2020

U.S. DISTRICT COURT EASTERN DISTRICT OF MC ST. LOUIS

UNITED STATES OF AMERICA,)	ST. LOUIS
Plaintiff,) _	
v.) No.	4:20CR00468 RLW/PLC
THOMAS J. BOWLES,)	
Defendant.)	• • • • • • • • • • • • • • • • • • •

INDICTMENT

COUNT I

The Grand Jury charges that:

From on or between about January 1, 2016 and August 20, 2020, within the Eastern District of Missouri, in and affecting interstate commerce, the Defendant,

THOMAS J. BOWLES,

did knowingly recruit, entice, transport, provide, obtain, maintain, patronize and solicit "Jane Doe 1" having had a reasonable opportunity to observe "Jane Doe 1" and knowing or in reckless disregard that "Jane Doe 1" was under the age of 18 years old and knowing and in reckless disregard that "Jane Doe 1" would be caused to engage in a commercial sex act,

in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c) and 1594(a).

COUNT II

The Grand Jury further charges that:

From on or between about January 1, 2020 and August 20, 2020, within the Eastern District of Missouri, in and affecting interstate commerce, the Defendant,

THOMAS J. BOWLES,

did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize and solicit "Jane Doe 2" having had a reasonable opportunity to observe "Jane Doe 2" and knowing or in reckless disregard that "Jane Doe 2" was under the age of 18 years old and knowing and in reckless disregard that "Jane Doe 2" would be caused to engage in a commercial sex act,

in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1591(c) and 1594(a).

COUNT III

The Grand Jury further charges that:

From on or between about January 1, 2016, and August 20, 2020, within the Eastern District of Missouri,

THOMAS J. BOWLES,

the Defendant herein, did use any facility and means of interstate commerce, and did knowingly attempt to persuade, induce, entice and coerce a minor, under the age of eighteen, to engage in sexual activity for which any person could be charged with a criminal offense, to wit: the Defendant, who was at least twenty-one years of age, communicated via the internet with "Jane Doe 1," who the Defendant knew to be under the age of seventeen, and attempted to persuade, induce, entice and coerce "Jane Doe 1," to engage in prostitution and in sexual activity, in violation of Missouri Revised Statutes Sections 566.034 (statutory rape in the second degree), 566.064 (statutory sodomy in the second degree), 566.071 (child molestation in the fourth degree), 566.083 (sexual misconduct involving a child), 566.211 (sexual trafficking of a child in the second degree), 567.020 (prostitution), 567.030 (patronizing prostitution) and 567.070 (promoting prostitution in the third degree),

in violation of Title 18, United States Code, Section 2422(b).

COUNT IV

The Grand Jury further charges that:

From on or between about January 1, 2020, and August 20, 2020, within the Eastern District of Missouri,

THOMAS J. BOWLES,

the Defendant herein, did use any facility and means of interstate commerce, and did knowingly attempt to persuade, induce, entice and coerce a minor, under the age of eighteen, to engage in sexual activity for which any person could be charged with a criminal offense, to wit: the Defendant, who was at least twenty-one years of age, communicated via the internet with "Jane Doe 2," who the Defendant knew to be under the age of seventeen, and attempted to persuade, induce, entice and coerce "Jane Doe 2," to engage in prostitution and in sexual activity, in violation of Missouri Revised Statutes Sections 566.034 (statutory rape in the second degree), 566.064 (statutory sodomy in the second degree), 566.071 (child molestation in the fourth degree), 566.083 (sexual misconduct involving a child), 566.211 (sexual trafficking of a child in the second degree), 567.020 (prostitution), 567.030 (patronizing prostitution) and 567.070 (promoting prostitution in the third degree),

in violation of Title 18, United States Code, Section 2422(b).

COUNT V

The Grand Jury further charges that:

From on or between January 1, 2016 and August 20, 2020, within the Eastern District of Missouri,

THOMAS J. BOWLES,

the defendant herein, being required by Federal and other law to register as a sex offender, did commit felony offenses involving one or more minors under Title 18, United States Code,

Section 1591 and/or Title 18, United States Code, Section 2422, to wit: the felony offenses alleged in Counts I-IV of this Indictment; in violation of Title 18, United States Code, Section 2260A.

A TRUE BILL.

FOREPERSON

JEFFREY B JENSEN United States Attorney

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